

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Tasia Williams and Vincent Doyle,	§
	§
	§
<i>Plaintiffs,</i>	§
	§
	§
v.	§ CIVIL ACTION NO. 3:20-CV-1526-L
	§
	§
CITY OF DALLAS, TEXAS; ULYSHA RENEE HALL Chief of Police, Dallas Police Department. In her individual capacity; and JOHN DOE POLICE OFFICERS 1–50,	§
	§
	§
	§
<i>Defendants.</i>	§
	§

JOINT SETTLEMENT STATUS REPORT

Pursuant to the Court’s Scheduling Order dated September 3, 2020 [Doc. 19] (“Order”) requiring the Parties to confer and file a Settlement Status Report by December 2, 2020 (“Report”), the Parties, Plaintiffs Tasia Williams and Vincent Doyle (collectively, “Plaintiffs”), and Defendants City of Dallas, Texas, and Dallas Police Department Chief of Police Ulysha Reneé Hall, file this Report and state:

Settlement Status Report: Counsel for the Parties, George Oginni, Morgan McPheeters, and Michelle Simpson-Tuegel for Plaintiffs, and Tatia R. Wilson for Defendants, conferred via ZOOM on November 30, 2020, and discussed the possibility of settlement and timing of potential settlement negotiations.

Assessment of Settlement Prospects: The Parties agree that settlement may be possible through mediation; however, they believe that settlement negotiations would be more beneficial after meaningful discovery.

Status of Settlement Negotiations: Offers of settlement have not been made by either side, and the Plaintiffs anticipate needing additional discovery before they can be made. Defendants likewise will need to conduct discovery to evaluate the Plaintiffs’ alleged claims and damages properly. Defendants moreover believe that settlement negotiations at this stage in the litigation are premature because they intend to file dispositive motions that could dispose of all or some of the Plaintiffs’ claims.

Positions Regarding Mediation or ADR: The Parties are amenable to mediation or ADR. The Plaintiffs believe that mediation or ADR would be most effective after the parties have conducted some meaningful discovery. The Parties intend to confer again in the next month to discuss selecting a mutually agreeable mediator and possible dates for mediation in 2021.

Respectfully Submitted,

By:/s/ *Michelle Simpson Tuegel* _____

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